

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LEARNING ANNEX HOLDINGS, LLC,
LEARNING ANNEX, LLC, and
LEARNING ANNEX, L.P.,

Plaintiffs,

v.

RICH GLOBAL, LLC,

Defendants.

09 Civ. 4432 (SAS) (GWG)

ECF Case

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, the Declaration of John H. Longwell and accompanying exhibits, the Declaration of Anthony Humpage, and all other papers and proceedings herein, Defendant Rich Global, LLC will move this Court, before the Honorable Shira A. Scheindlin, United States District Judge for the Southern District of New York, on a date and at a time to be set by the Court, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, Courtroom 15C, for an order (1) staying enforcement of the judgment in this matter, pending disposition of the appeal, under Rule 62(d) of the Federal Rules of Civil Procedure; and (2) waiving the requirement of a supersedeas bond.

Dated: July 20, 2012
New York, New York

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

By: /s/ Lewis R. Clayton
Lewis R. Clayton (lclayton@paulweiss.com)
Daniel J. Leffell (dleffell@paulweiss.com)
John H. Longwell (jlongwell@paulweiss.com)

1285 Avenue of the Americas
New York, New York 10019
Tel. (212) 373-3000

Attorneys for Defendant Rich Global, LLC